

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Theodore Tsekerides (*pro hac vice*)
(theodore.tsekerides@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT ON DEBTOR'S MOTION
PURSUANT TO FED. R. BANKR. P.
4001(d) TO APPROVE STIPULATION
BETWEEN PACIFIC GAS AND
ELECTRIC COMPANY AND RICHARD
TROCHE, ROBERT RIGLEY, STEVE
FREDIANI, AND MICHAEL DION FOR
LIMITED RELIEF FROM THE
AUTOMATIC STAY**

[Re: Dkt. No. 6722]

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (each, a “**Debtor**,” and collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Debtors’ Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation between Pacific Gas and Electric Company and Richard Troche, Robert Rigley, Steve Frediani, and Michael Dion for Limited Relief from the Automatic Stay* [Dkt. No. 6722] (the “**Motion**”).

RELIEF REQUESTED IN THE MOTION

The Motion seeks an order approving an agreement between the Utility and Richard Troche, Robert Rigley, Steve Frediani, and Michael Dion as embodied in the *Stipulation between Pacific Gas and Electric Company and Richard Troche, Robert Rigley, Steve Frediani, and Michael Dion for Limited Relief from the Automatic Stay* (the “**Stipulation**”), which was attached to the Motion as **Exhibit A**. A proposed order (the “**Proposed Order**”) was attached as **Exhibit B** to the Motion.

NOTICE AND SERVICE

A *Notice of Opportunity for Hearing on Debtors’ Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation between Pacific Gas and Electric Company and Richard Troche, Robert Rigley, Steve Frediani, and Michael Dion for Limited Relief from the Automatic Stay* was filed concurrently with the Motion on April 9, 2020 [Dkt. No. 6724] (the “**Notice of Opportunity for Hearing**”). The Motion, the supporting declaration of Theodore E. Tsekerides [Dkt. No. 6723], and the Notice of Opportunity for Hearing were served as described in the Certificate of Service of Alain B. Francoeur, filed on April 14, 2020 [Dkt. No. 6755].

The deadline to file responses or oppositions to the Motion has passed, and no oppositions have been filed with the Court or received by counsel for the Debtors.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response or opposition has been filed with respect to the Motion.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the form attached to the Motion, granting the Motion as set forth therein.

Dated: May 4, 2020

**WEIL, GOTSHAL & MANGES LLP
KELLER BENVENUTTI KIM LLP**

/s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Debtors in Possession